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Attorneys on behalf of Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

**IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

No. MD-15-02641-PHX-DGC

**AMENDED MASTER SHORT FORM
COMPLAINT FOR DAMAGES FOR
INDIVIDUAL CLAIMS AND DEMAND
FOR JURY TRIAL**

Plaintiff(s) named below, and for their Complaint against Defendants named below,
incorporate The Master Complaint in MDL No. 2641 by reference. Plaintiff(s) further show the
court as follows:

1. Plaintiff/Deceased Party:

Alethia Jones

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium
claim:

N/A

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

N/A

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:

Texas

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

Texas

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Texas

7. District Court and Division in which venue would be proper absent direct filing:

In the United States District Court for the Northern District of Texas

8. Defendants (Check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction

☒ Diversity of Citizenship

- a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

Paragraphs 1 through 14 of the Master Complaint

A substantial portion of the events leading to Plaintiff's injuries arose in Texas making venue proper.

10. Defendants' Inferior Vena Cava Filter (s) about which Plaintiff(s) is making a claim

(Check applicable Inferior Vena Cava Filter(s)):

- ☐ Recovery ® Vena Cava Filter
- ☐ G2 ® Vena Cava Filter
- ☐ G2® Express (G2X) Vena Cava Filter
- ☐ Eclipse® Vena Cava Filter
- ☐ Meridian® Vena Cava Filter
- ☒ ~~Denali® Vena Cava Filter~~
- ☐ S. Other:

11. Date of Implantation as to each Product

11/16/2010

12. Counts in the Master Complaint brought by Plaintiff(s)

- ☒ Count I: Strict Products Liability-Manufacturing Defect
- ☒ Count II: Strict Products Liability-Information Defect (Failure to Warn)
- ☒ Count III: Strict Products Liability-Design Defect
- ☒ Count IV: Negligence- Design
- ☒ Count V: Negligence-Manufacture
- ☒ Count VI: Negligence-Failure to Recall/Retrofit
- ☒ Count VII: Negligent Misrepresentation
- ☒ Count VIII: Negligent *Per Se*
- ☒ Count X: Breach of Express Warranty
- ☒ Count XI: Breach of Implied Warranty
- ☒ Count XII: Fraudulent Misrepresentation
- ☒ Count XIII: Fraudulent Concealment
- ☒ Count XIV: Violations of Applicable Texas Law
Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- ☐ Count XV: Loss of Consortium
- ☐ Count XVI: Wrongful Death
- ☐ Count XVII: Survival
- ☒ Punitive Damages

Date: January 17, 2018

By: /s/ Willard J. Moody, Jr.
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